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Minnesota Pollution Control Agency

June 14, 1995

Mr. James W. Brown
Principal Process Engineer
Metropolitan Waste Water Treatment Plant
Mears Park Centre
230 East Fifth Street
St. Paul, Minnesota 55101

RE: April 6, 1995, Test Plan Submittal for the 1995 MMT and MCWS/AQD Performance Tests as stated in the letter dated April 6 and May 2, 1995, which identifies the testing schedule on Incinerators 5-10

Dear Mr. Brown:

This letter concludes the pretest requirements for the Metropolitan Council / Wastewater Services (Company) facility located in St. Paul, Minnesota, as discussed during our pretest meeting of May 9, 1995.

The Air Quality Division (AQD) staff of the Minnesota Pollution Control Agency (MPCA) has reviewed the submittal and has approved the test plan with the following provisions:

1. Based on the limitations of the Particulate Matter less than 10 um in size (PM10) sampling train, (U.S.) Environmental Protection Agency (EPA) Methods 201A and 202, in regards to the current design and exit velocities of the stack gases from the Company's facility, the following has been established as worst case operating conditions, as required by Minn. R. 7017.2025, subp. 2, for performance testing to be conducted during the 1995 year. The Company must demonstrate that the incinerator's sludge feed rate, in dry tons per hour, at the time of the performance test is greater than or equal to 80 percent of the incinerator's average maximum daily sludge feed rate for a period of four weeks surrounding the performance test. These four (4) weeks must consist of one (1) week post and the three (3) weeks prior to the performance test. Additionally, the Company must continue to pursue the certification of the smaller PM10 sampling nozzles from the Office of Air Quality Performance Standards (OAQPS), as a viable option for the 1996 performance testing. If the incinerator's achieved sludge feed rate, in dry tons per hour, during the performance test is less than 80

percent of the incinerator's average maximum daily sludge feed rate during the four-week period, then the incinerator's maximum sludge feed rate, as defined in Minn. R. 7017.2025, subp. 3, will be limited to the achieved sludge feed rate for either the PM or the PM10 performance test, which ever is lower.

2. The following has been established as worst case operating conditions, as required by Minn. R. 7017.2025, subp. 2, for PM sampling, EPA Method 5, for performance testing to be conducted during the 1995 year. The Company must demonstrate that the incinerator's sludge feed rate, in dry tons per hour, at the time of the performance test was greater than or equal to 90 percent of the incinerator's average maximum daily sludge feed rate for a period of four weeks surrounding the performance test. These four (4) weeks must consist of one (1) week post and the three (3) weeks prior to the performance test. If the incinerator's achieved sludge feed rate, in dry tons per hour, during the performance test is less than 90 percent of the incinerator's average maximum daily sludge feed rate during the four-week period, then the incinerator's maximum sludge feed rate, as defined in Minn.R. 7017.2025, subp. 3, will be limited to the achieved sludge feed rate for either the PM or the PM10 performance test, which ever is lower.
3. The Company will fire Incinerator #5 with fuel oil and perform Method 29, for multiple metals sampling. This has been determined to be worst case operating conditions as defined by Minn. R. 7017.2025, subp. 2. The Company may submit a copy of the vendor's certificate of analysis provided the certificate indicates all permit requirements regarding the analysis of the fuel. If the certificate does not meet these requirements, the Company will conduct the appropriate analysis.
4. The Company will feed "scum" during the PM and PM10 performance testing conducted on Incinerator #7. This has been identified as worst case operating conditions, as defined by Minn. R. 7017.2025, subp. 2.
5. The Company must monitor and record at a minimum of 15 minute intervals, the operating conditions stated in Part III. Operating Conditions of the submitted test plans.

These provisions are modifications to the test plan, and are to be incorporated into the proposed test.

The Company stated they had sufficient copies of the Operating Data Summary For Combustion Sources, Operating Data Summary For Process Sources, Certifications Required For Performance Test Reports, and Microfiche Submittal forms. Therefore, none were

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distributed or enclosed. These forms will help you to comply with the submittal requirements of Minn. R. 7017.2035 and 7017.2040. **A copy of the test plan, including this letter, must be included as part of the performance test report.**

Please remember that it is not the Testing Consultant's responsibility to submit the test report or microfiche copy of the test report or to certify that the microfiche submitted is an exact copy of the original test report by the deadlines specified in the applicable compliance document (i.e., permit, stipulation agreement, administrative penalty order, etc.). The responsibility for these submittals lies solely with the Company.

Please be aware that enforcement action will be taken for performance test failures that may include civil penalties. Action will not be initiated until the results of the first retest are reviewed. Upon written notice of a second performance test failure, the Company will be required to either shut down the tested process unit(s) or to submit a compliance plan, subject to MPCA approval. The compliance plan should indicate specific measures to be taken which are expected to allow the unit(s) to operate in compliance with the applicable emission limitations, when the measures will be implemented, and when a retest will be conducted. The compliance plan must also include specific measures the facility will take to minimize emissions until compliance is demonstrated. The compliance plan will be inserted into an enforcement document. Results of a performance test are not final until MPCA staff provides written compliance determination.

If you have any questions regarding this letter or the enclosures, please call me at 612-297-8301.

Sincerely,



Craig D. Averbman
Performance Test Coordinator
Compliance Determination Unit
Compliance and Enforcement Section
Air Quality Division

CDA:gr

cc: Hans Walter-Peterson, Air Quality Division
Carol Andrews, Air Quality Division
AQD File No.: 879